

## **EXHIBIT**

**3**

**Defendant's Answers and Objections to Plaintiff's First Set of Interrogatories**

1. Objection seeking irrelevant information
2. Objection seeking irrelevant information
3. Objection to as overly broad, vague, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence, or information already provided to the Plaintiff.
4. Objection, seeking irrelevant information, not reasonably calculated to lead to the discovery of admissible evidence, unknown information or information already provided to the Plaintiff.
5. Defendant is exercising their Civil Rights as guaranteed by the United States Constitution.
6. Defendant is exercising their Civil Rights as guaranteed by the United States Constitution.
7. Objection to as overly broad, vague and unable to be answered in the manner promulgated, or work product.
8. Objection seeking irrelevant information, information that has already been provided to the Plaintiff, or not reasonably calculated to lead to the discovery of admissible evidence.
9. Objection to as overly broad, vague and unable to be answered in the manner promulgated, or seeking irrelevant information. Exhibits and Trial witnesses will be identified per Court's Final Pre-trail Order. Notwithstanding objection, Plaintiff is referred to Defendant's Witness and Exhibit Lists.
10. Objection to as overly broad, vague and unable to be answered in the manner promulgated, or seeking irrelevant information, inadmissible information, or seeking privileged information or unknown information.
11. Known information has already been provided to the Plaintiff.
12. Objection seeking irrelevant information, inadmissible information, private or privileged information.

